

Bradley S. Keller, WSBA #10665
Ralph E. Cromwell, Jr., WSBA #11784
Jofrey M. McWilliam, WSBA #28441
Byrnes Keller Cromwell LLP
1000 Second Avenue, 38th Floor
Seattle, WA 98104
(206) 622-2000
Facsimile No.: (206) 622-2522

Attorneys for Perkins Coie LLP

The Honorable Frederick P. Corbit
Chapter: 7

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In Re:

GIGA WATT, INC., a Washington
corporation,

Debtor.

MARK D. WALDRON, as Chapter 7
Trustee,

Plaintiff,

vs.

PERKINS COIE, LLP, a Washington
limited liability partnership; LOWELL
NESS, individual and California resident;
GIGA WATT PTE., LTD. a Singapore
corporation; and ANDREY KUZENNY, a
citizen of the Russian Federation;

Defendants

and

THE GIGA WATT PROJECT, a
partnership,

Nominal defendant.

No. 18-03197-FPC11

The Honorable Frederick P. Corbit

CHAPTER 7

Adv. Case No. 20-80031

**REQUEST TO WITHDRAW
PERKINS AND TRUSTEE'S
JOINT MOTION FOR AN
ORDER TO SHOW CAUSE RE
SUBPOENA TO INTUIT INC.**

1 Defendants Perkins Coie and Lowell Ness (“Perkins”) and Mark D. Waldron
2 (“Trustee”) submitted a Joint Motion for an Order to Show Cause re Subpoena to
3 Intuit Inc. in this matter. *See* ECF No. 91. Oral argument on the Motion is set to be
4 heard on August 2, 2022, at 1:30 p.m. *See* ECF No. 93.
5

6
7 Based on discussions and a confirming email with the Trustee’s counsel, both
8 the Trustee and Perkins hereby withdraw the Joint Motion for an Order to Show
9 Cause re Subpoena to Intuit Inc., and request the motion be stricken for hearing from
10 the Court’s schedule.
11

12 DATED this 25th day of July, 2022.

13 BYRNES KELLER CROMWELL LLP

MUNDING, P.S.

14
15 By /s/ Bradley S. Keller

Bradley S. Keller, WSBA #10665

16 By /s/ Ralph E. Cromwell, Jr.

17 Ralph E. Cromwell, Jr., WSBA #11784

18 By /s/ Jofrey M. McWilliam

Jofrey M. McWilliam, WSBA #28441

19 1000 Second Avenue, 38th Floor

20 Seattle, Washington 98104

206-622-2000

21 Fax: (206)-622-2522

22 Email: bkeller@byrneskeller.com

rcromwell@byrneskeller.com

23 jmcwilliam@byrneskeller.com

By /s/ John Munding

John Munding, WSBA #21734

309 E. Farwell Rd., Suite 310

Spokane, Washington 99218

509-590-3849

Fax: (509) 624-6155

Email: john@mundinglaw.com

Attorneys for Perkins Coie LLP and

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26